

**DECLARATION OF RICKEY IVIE, ESQ.**

**I, Rickey Ivie, declare:**

1. I am an attorney at law duly licensed and admitted to practice before all courts of the State of California, in the United States District Court for the Central, District and the United States Supreme Court. I am an attorney at the law firm of Ivie McNeill Wyatt Purcell & Diggs, APLC attorneys of record for Defendants COUNTY OF LOS ANGELES, et.al. in this case. The foregoing facts are within my personal knowledge and, if called as a witness herein, I can and will competently testify thereto.

2. This declaration is made in support of Defendants' Motion to Bifurcate Trial.

3. This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on October 4, 2021.

4. A true and correct copy of the Plaintiff's "Third," "Fourth," "Fifth," "Sixth," "Seventh," "Eighth," "Ninth," "Tenth," "Eleventh," and "Twelfth," "Thirteenth," "Fourteenth," "Fifteenth," "Sixteenth," "Seventeenth," "Eighteenth," and "Nineteenth," "Supplemental Disclosures" (only the pleading pages are attached due to the voluminous nature of the exhibits) are attached hereto as Exhibit 1, collectively.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16<sup>TH</sup> day of October, 2021, at Los Angeles, California.

/s/ Rickey Ivie  
Declarant